

Jill K. Underly, PhD, State Superintendent

Date: November 15, 2021

To: New Schools Interested in Participating

in the Private School Choice Programs (PSCP or Choice)

From: Private School Choice Programs Staff

Re: PSCP 2022-23 Registration Forms and Information for New Schools

Please read the following information detailing the requirements for a private school to register to participate in the PSCP for the 2022-23 school year.

This letter will cover the following items required for registration:

- Notice of School's Intent to Participate in the PSCP for the 2022-23 School Year
- Voluntary Agreement for the Department of Public Instruction (DPI) Approval of School's Random Selection
 Plan
- Intent to Offer Summer School (for schools interested in Summer School)
- Auditor Fee
- Disclosure of Information Form
- Combined Private Schools (for schools interested in entering into an agreement)
- Designee Authorization and Update Form
- Required Training for New Schools

Additional information also included for the following:

- Surety Bond and New Schools Budget & Cash Flow Report Requirements
- Federal Tax Id Number Letter from the Internal Revenue Service
- Hours of Instruction Report
- Count Dates
- Accreditation Requirements
- Insurance and Fidelity Bond Requirements
- PSCP Open Application Periods
- Student Information System

Please note, all of the school registration forms and the auditor fee are due to the DPI by Monday, January 10, 2022, unless otherwise noted. If a school fails to meet this deadline, the school will not be eligible to participate in the PSCP during the 2022-23 school year. Therefore, it is in the school's best interest to submit these required forms as soon as possible so that any errors or questions can be resolved well in advance of the January 10 deadline.

The <u>School Registration Checklist</u> was created to assist schools in ensuring all registration forms are completed correctly and all required information has been submitted to the DPI by the deadline. The DPI encourages all schools to use the registration checklist to keep track of school registration requirements.

If you have questions concerning this information, please email <u>privateschoolchoice@dpi.wi.gov</u> or call 888-245-2732 ext. 3.

Notice of School's Intent to Participate (ITP): The school's ITP must be completed, signed, and submitted electronically by the school's Choice administrator in the <u>Online Application System (OAS)</u> no later than **January 10** in order for the school to be eligible to participate in the PSCP for the 2022-23 school year. The electronic ITP form will be available in OAS through 11:59 pm on January 10.

To request access to OAS, the new school's Choice administrator must email the information below to privateschoolchoice@dpi.wi.gov. The new school's Choice administrator should send the email with the information below from his or her school email address (not from a personal email address) as this is the email address the DPI will use for communication going forward for the Choice program. The DPI recommends schools request OAS access as soon as possible but no later than Thursday or Friday before the due date of Monday, January 10.

- 1. Private School Code: See the Private School Directory for the code. Schools may also access the directory from the Private School Choice Programs homepage (fourth from the bottom on left menu bar). Schools that do not have a private school code may have been required to meet certain requirements by the prior August 1 to be eligible to participate in the Choice program in the upcoming school year. See the school registration page for additional information.
- 2. School legal name: The school's legal name should match the school's name in the Private School Directory. If the school's legal name is not correct in the Private School Directory, please also indicate this in the email and the DPI will provide next steps.
- 3. School's Choice administrator legal name: Include the Choice administrator's first and last legal name.
- 4. School's Choice administrator phone number: Include school phone number for administrator.
- 5. Request statement: A statement that the Choice administrator is requesting access to OAS for the new school to complete the ITP for the 2022-23 school year.

The DPI will provide OAS user access information to the school's Choice administrator via secure email that the administrator may use to sign into OAS and submit the ITP. Choice administrators are also required to complete trainings and online quizzes by Friday, January 14, but do not have to complete the trainings or quizzes prior to submitting the ITP in OAS. These trainings and quizzes must be completed by January 14 or OAS access will be removed. See the New School Training Requirements section of this document for additional information.

Please read each section of the ITP form in OAS and ensure you understand the information contained within the form before signing and submitting the form. By electronically signing the form, you agree that compliance with program requirements constitutes a condition of receipt of funds and that in the event of failure to comply, your school's participation in the program can be terminated and/or PSCP payments withheld.

In order to process state aid payments under the state financial accounting system, STAR, all schools must provide the DPI with their school's Federal Employer Identification Number (FEIN). This information must be provided on the ITP form. If the school does not yet have a FEIN, please indicate "TBD" on the form.

New schools will also enter their STAR Aids Register Agency Id when completing the ITP. If the school does not yet have an Agency Id, please indicate "TBD" on the ITP form. See the <u>Aids Register</u> for the school's Agency Id. Enter the school's legal entity name in the Aids Register Agency Name box, click in the agency Id box, and the agency Id is automatically displayed. Schools may also access the Aids Register from the <u>Private School Choice</u> <u>Programs homepage</u> (second from the bottom on left menu bar).

Please note the administrator completing and signing the ITP must be the sole owner of the school or appointed by the operating organization of the school and must have at least a bachelor's degree from an accredited institution of higher education or a teaching license or administrator's license issued by the department.

State law requires schools to ensure that an owner, officer, director, trustee, administrator, administrator's designee or an individual with administrative, financial or pupil health and safety responsibilities, whether compensated or uncompensated, is not a disqualified person as defined under Wis. Stats. §§119.23(1)(ag) or 118.60(1)(ag). A disqualified person is defined as a person who had a controlling ownership interest in, or was an officer, director or trustee of a private school barred or terminated from the program, or was the administrator of

a private school, a person identified as an administrative designee, or an individual responsible for the activity that resulted in an order being issued barring or terminating a private school from participation in the program. If a school retains a disqualified person, the school may be terminated from the program. The list of disqualified individuals is available on the <u>Information for Schools</u> webpage.

Random Selection Plan: Schools participating in the Milwaukee Parental Choice Program (MPCP) and/or the Racine Parental Choice Program (RPCP) must have a random selection plan to ensure students are selected on a random basis. If the number of eligible Choice student applications for any grade level received during an open application period exceeds the number of seats available, schools must hold a random drawing to determine which applicants are accepted and the waiting list order. State law requires the DPI to conduct the random selection for the Wisconsin Parental Choice Program (WPCP) for the 2022-23 school year. Therefore, schools that will only participate in the WPCP are not required to submit a random selection plan. Please see the Random Selection section of the Application Process Bulletin for additional information.

Each private school that intends to participate in the MPCP and/or the RPCP shall submit its random selection plan and have the plan approved by the State Superintendent no later than the due date of the ITP, **January 10**.

The Choice administrator of the school may choose *one of the following* for the random selection plan:

- 1. Voluntarily agree that the school will accept students into the MPCP and/or the RPCP and conduct a random selection, if required, in accordance with the random selection agreement on the <u>school registration page</u>. The school may select the voluntary agreement when completing the ITP.
- 2. Submit its own random selection plan for approval by the State Superintendent prior to the due date of the ITP, January 10. The school may select to submit its own random selection plan when completing the ITP. The school will then submit the plan via email to the DPI at privateschoolchoice@dpi.wi.gov. The plan must be submitted to the DPI and approved by the State Superintendent prior to January 10. If a school fails to meet this deadline, the school will not be eligible to participate in the PSCP during the upcoming school year. It is in the school's best interest to submit the plan as soon as possible so that any edits or questions may be resolved well in advance of the January 10 deadline.

Summer School: PSCP schools that are interested in offering Choice summer school in the upcoming summer will indicate their intent to offer a Choice summer school program on the ITP. The schools will also enter the expected number of students for the summer school program in the ITP. Choice administrators interested in offering summer school should review the Summer School Bulletin. Schools should note that summer school courses funded through federal Title programs are not eligible for payment through the private school Choice summer school program.

Auditor Fee: Private schools that intend to participate in the PSCP must pay the DPI a nonrefundable Auditor fee of \$275. This fee must be received by **January 10**. The school may submit the \$275 auditor fee payment by one of the following methods:

- 1) Pay online via the Online Auditor Fee Form, OR
- 2) Mail the paper Auditor Fee Form with a cashier's check (mailing address on form).

The links to the Online Payment Form or the paper Auditor Fee Form are on the <u>school registration webpage</u>. **The DPI recommends** the school use the online payment option. If the school pays online, do not mail the paper form to the **DPI**.

No refunds of the fee will be made, regardless of whether or not the school participates in the PSCP.

Note: New schools that registered by August 1, 2021 paid an auditor fee at that time. The fee paid by August 1, 2021 for participation in the 2022-23 school year will be applied to the auditor fee requirement for the 2022-23 school year. Since the amount due January 10, 2022 is less than the amount that was paid, the DPI will issue a payment to the schools for the difference.

Disclosure of Information: By January 10, schools new to the Choice program must provide the DPI with copies of all information required by Wis. Stats. §§ 119.23(6m) and (6p)(a) and 118.60(6m) and (6p)(a). This information must be provided to each Choice student or parent who applies to attend the school. By January 10, the school must also provide the DPI with a signed statement from each individual who is a member of the school's governing body verifying that the individual is a member of the governing body. A template is provided to assist with the completion of these requirements on <u>School Submitted Reports and Forms</u> webpage.

Note: New schools that registered on August 1, 2021 and submitted the Disclosure of Information template and form have met this requirement and are not required to resubmit the information.

New schools entering into a Combined Private School Agreement must submit a Disclosure of Information form to the DPI signed by the governing board of the currently participating private school.

Combined Private Schools: Private schools new to either the WPCP or the RPCP may enter into an agreement to be subject to the same governing board as a private school currently participating in the WPCP or the RPCP. With this agreement, prior year attendance requirements would not be required for two years for students applying to the new school. More information may be found in the Combined Private Schools and Prior Year Attendance Bulletin. New schools interested in a combined school agreement must email a completed, signed agreement to privateschoolchoice@dpi.wi.gov by January 10 and must submit the Disclosure of Information Form to the DPI signed by the governing board of the currently participating private school.

Designee Authorization and Update Form, Trainings and Quiz: The school's Choice administrator may designate one or more individuals to assist in processing Choice student applications and other reports in OAS. Schools interested in adding new designee(s) should see the Designee Training and Access to OAS webpage, which lists the trainings, quiz and the Designee Authorization and Update form (sections I, II and III) that must be completed and submitted. Once the trainings and quiz are complete and a Designee Authorization and Update Form has been submitted via email to privateschoolchoice@dpi.wi.gov, the DPI will provide OAS user access information to the new designee via secure email. Please note that OAS access is not provided to designees for new schools until mid to late January for those that complete the trainings and quiz and submit the form prior to January 10.

- Trainings and Quiz: New designees must complete trainings and an online quiz related to use of the
 OAS, unless the person has been a Choice administrator or designee within two years of the effective
 date listed in Section I of the Designee Authorization and Update Form. Links to the required trainings
 and the quiz can be found on the following webpage: <u>Designee Training and Access to OAS</u>.
- Designee Authorization and Update Form: This form is used when a school will have a new designee and when there is a change to contact information for a current designee. This form must be on file at the DPI before an individual can begin processing Choice student applications. The form, with the signatures of both the Choice administrator (only for new designees but not needed to change designee contact information) and designee(s), may be submitted at any time during the school year and should be emailed to privateschoolchoice@dpi.wi.gov. The form is found on the following webpage: School Submitted Reports and Forms.

New School Training Requirements: The individual designated as the Choice administrator of a new school is required to participate in Fiscal Management Training in order to be eligible to participate in any of the Choice programs. It is strongly advised that new schools have more than one representative who qualifies to serve as the school's Choice administrator complete the trainings. New schools **are not** permitted to change who will serve as the Choice administrator prior to August 1 unless the individual has completed Parts One and Two of the Fiscal Management Training

Part One of the Fiscal Management Training must be completed by the new school's Choice administrator no later than Friday, January 14. Part One will require Choice administrators of new schools to read through

information on general program requirements, school registration, required reports, testing, use of OAS and other important requirements of the Choice programs and complete two online quizzes. The Program Requirements Training and Quiz and the OAS Access Trainings and Quiz can be found on the Choice Administrator Training and Access to OAS webpage. These trainings and quizzes must be completed by January 14 or OAS access will be removed.

Part Two of the Fiscal Management Training course will provide in depth information on the Choice program financial requirements, including how to prepare the DPI provided Budget and Cash Flow Report. All Choice administrators are required to complete this training. In addition, the DPI strongly recommends that the individual responsible for the school's accounting or bookkeeping also complete the training. An email will be sent to the Choice administrators when these trainings are available. The DPI expects the training will be available by the beginning of March.

Surety Bond or Budget and Cash Flow Report: Schools new to the PSCP are required to submit one of the following to the DPI by May 1:

- Surety Bond: A surety bond payable to the state in an amount equal to 25 percent of the total amount of payments the private school expects to receive under Wis. Stats. §§118.60 and/or 119.23 during the first school year the private school participates in the program under this section. If the school chooses the surety bond option, the school will be required to annually provide a surety bond every year by May 1 until the requirements to remove the bond are met. The DPI will email the Choice administrator the 2022-23 surety bond form with prefilled information for the school by mid-March. By May 1, the school must email the completed surety bond, Power of Attorney form, and DocuSign Certificate of Completion (if applicable) as a pdf document to dpichoiceauditreports@dpi.wi.gov. Or
- **DPI Budget & Cash Flow Report**: Schools must complete the 2022-23 DPI Budget and Cash Flow Report (budget) that will be posted to the <u>School Submitted Reports and Forms</u> webpage. The budget must include the financial information for the entire legal entity of the school. Also, the budget must show that the school is financially viable and that the school has sufficient contingency funding. Financially viable means that the school is able to pay for goods and services, make debt service payments, and pay other obligations as they become due. Contingency funding is funding that will be used if the school's actual enrollment is less than expected.

Training 3-5 available on the On Demand Training webpage provides information on the surety bond and the DPI Budget & Cash Flow Report options. Part 2 of the Fiscal Management Training will further explain the DPI Budget & Cash Flow Report.

Even if a school selects the surety bond option, the school is still required to complete a budget by June 30. A school that selects the surety bond option may either use DPI's Budget and Cash Flow Report or prepare its own budget. If the school prepares its own budget, the budget must include the following:

- 1. Anticipated enrollments for all pupils enrolled in the school (3rd Friday in September and 2nd Friday in January).
- 2. Anticipated enrollments for Choice program pupils (3rd Friday in September and 2nd Friday in January).
- 3. Estimated total revenues and costs.
- 4. Estimated eligible education expenses for the Choice program.
- 5. Estimated offsetting revenues for the Choice program.
- 6. A schedule of anticipated beginning and ending net assets.
- 7. Anticipated beginning and ending Choice program reserve balance.
- 8. Identification of the contingent funding sources the school will use should actual enrollments be less than expected.

Additional information on the budget required for schools that select the surety bond option is available in Training 6-3 on the On Demand Training webpage. Schools that select the surety bond option do not need to submit the budget to the DPI unless DPI specifically requests it. The school's independent auditor will review the school's budget and ensure that this requirement has been met as part of the Fiscal & Internal Control Practices Report. The Fiscal & Internal Control Practices Report review is performed annually. The report is due to the DPI every December 15th.

Federal Employer Identification Number (FEIN) Letter from the Internal Revenue Service (IRS): By January 10, schools should email the school's FEIN letter from the IRS to dpichoiceauditreports@dpi.wi.gov. The information on this letter is required in order for the new school to be set up to receive Choice program payments from the DPI and for new schools choosing the surety bond option. While schools are required to provide this letter to the DPI, failure to provide the letter by January 10th would not result in a school being ineligible to participate in the Choice programs. However, not providing this letter on a timely basis can delay a school receiving the surety bond form for their school and being set up to receive payments from the Choice programs. If the school is not able to locate its FEIN letter, it can request the letter from the IRS. Information on how to make this request is available at https://www.irs.gov/businesses/small-businesses-self-employed/lost-or-misplaced-your-ein. If you are experiencing difficulty obtaining your school's FEIN letter, please email dpichoiceauditreports@dpi.wi.gov.

Hours of Instruction: All private schools in Wisconsin are required to provide at least 875 hours of instruction each year. Choice schools have additional requirements.

Private schools that participate in the PSCP must provide at least 1,050 hours of direct pupil instruction to grades 1 to 6 each year and at least 1,137 hours to grades 7 to 12 each year. Hours include recess and time for pupils to transfer between classes, but do not include lunch periods. No more than 140 hours of work study under Wis. Stat. §118.56 may be counted as hours of direct pupil instruction. A school's accrediting organization may have additional requirements and it is recommended schools contact their accrediting organization for minimum requirements.

The minimum required hours for direct pupil instruction for a 0.5 FTE K4 and a 0.5 FTE K5 program are 437 hours each year. The scheduled daily hours for a 0.6 FTE, 0.8 FTE, and 1.0 FTE K5 program must match the scheduled daily hours for the full day of first grade, and a 0.6 FTE, 0.8 FTE, and 1.0 FTE K5 program must provide the applicable minimum hours of direct student instruction as seen below:

- 0.6 FTE program must provide at least 630 hours (students attend 3 full days of instruction each week)
- 0.8 FTE program must provide at least 840 hours (students attend 4 full days of instruction each week)
- 1.0 FTE program must provide at least 1,050 hours (students attend 5 full days of instruction each week)

Note: For schools that offer K5 *but do not offer first grade*, the required minimum K5 hours are 525 for a 0.6 FTE program, 700 for a 0.8 FTE program, and 875 for a 1.0 FTE program. For schools that only offer K4 and/or K5, at least one of the kindergarten programs must provide at least 875 hours of instruction.

All new schools must complete and submit the Hours of Instruction Excel Report showing that the school's scheduled hours of instruction meet these minimum requirements by the first weekday in May. The Hours of Instruction Excel Report file and an example of how to complete the Excel Report can be found on the following webpage: School Submitted Reports and Forms. Once completed, the school's Choice administrator must electronically sign and email a copy of the Hours of Instruction report as an Excel document to privateschoolchoice@dpi.wi.gov. Schools should not use Google sheets to complete or submit the Hours of Instruction Excel Report.

Additionally, each private school participating in the PSCP annually must report their Hours of Instruction on the Third Friday in September Count Report in OAS, due by the last weekday in September, showing that the school's scheduled hours of instruction meet these minimum requirements.

Count Dates: Schools are encouraged to have a full day of instruction on the count dates. In order for students to be eligible for Choice payments, the students need to be at the school on the count dates (3rd Friday in September and 2nd Friday in January) *or* any day before and any day after the count dates. If a student is not in attendance the full day of the count date, the school must ensure that the student was not enrolled in another school or home-based private educational program during the period of absence from the school. The count dates for the 2022-23 school year are: Friday, September 16, 2022, and Friday, January 13, 2023.

Accreditation and Preaccreditation Requirements: Private schools first participating in a PSCP will need to be preaccredited or fully accredited prior to participation. Please see the <u>Accreditation Bulletin</u> for details on accreditation and preaccreditation requirements and due dates.

Insurance & Fidelity Bond Requirements: Under Administrative Rules PI 35 and 48, all schools participating in the PSCP are required to continuously maintain minimum levels of insurance coverage and maintain a fidelity bond. Please see the Insurance and Fidelity Bond Bulletin for an overview of the requirements. New schools must have the required insurance coverage and the fidelity bond in effect by the first weekday in August. If the new school is offering Choice summer school, the coverage must be in effect by the first weekday in May. The school must provide a certificate of insurance showing that they have the required insurance, including the fidelity bond, by these dates. Proof of the required fidelity bond is usually included on the Certificate of Liability Insurance from the school's insurance agent. A Crime Employee Dishonesty policy meets this requirement if the policy provides loss coverage for acts resulting from dishonesty, malfeasance, or neglect by owners, officers or employees. Failure to maintain the required insurance coverage may result in the withholding of Choice payments and/or termination from the Choice program.

Open Application Periods Information: The Application Process Bulletin provides information on the rules and timelines related to open application periods. Open application periods are the only times schools may accept PSCP student applications. Please read through this information carefully as the school decides which of the open application periods the school will participate in during the 2022-23 school year. By law, schools participating in the WPCP may only accept student applications during one application period. If the school will participate in the WPCP, the school must participate in this open application period. After January 10, schools participating in the MPCP and the RPCP will not be allowed to amend their open application periods. Please note that the available open application periods differ for all three programs.

Student Information System (SIS): All new schools are required to have a SIS vendor capable of exchanging data with the state WISEdata system that is operational prior to the first day of school for the school year in which a school first participates in the Choice program.

A list of SIS vendors capable of exchanging data with the state WISEdata system is available at the <u>WISEdata page</u>. All Choice schools must submit secure attendance, graduation and demographic data for Choice students, which along with student-level assessment data will be used to create the annual school report cards mandated by the state legislature. The information on the <u>WISEdata: Info for Schools</u> webpage is a helpful resource for new schools.